

FEDERAL ELECTION COMMISSION

WASHINGTON, DC 20463

MAR - 2 2004

Richard L. Robinson Graydon Head & Ritchey LLP 2500 Chamber Center Drive, Suite 300 P.O. Box 17070 Ft. Mitchell, KY 41017

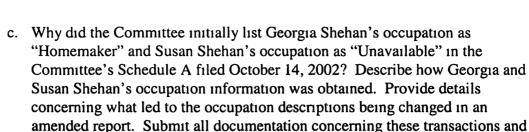
> RE: MUR 5335R Geoff Davis 2002 (a.k.a. Geoff Davis for Congress Committee) and Joe Green, Treasurer (a.k.a. Jody Green)

Dear Mr. Robinson:

As part of its investigation in the above-captioned matter, the Federal Election Commission requests that your above referenced clients submit answers in writing and under oath to the questions set forth below and produce the documents specified below within 15 days of your receipt of this request. In answering the questions below, please identify any individuals who are able to verify the information contained in your clients' responses by providing their full names, addresses and phone numbers through which we can reach them.

The questions and document requests directed at your clients are as follows:

- 1. Describe the circumstances surrounding the contributions made by Bill Shehan, Jr., Georgia Shehan and Susan Shehan to Geoff Davis 2002 ("the Committee").
 - a. Specify what type of information the Shehans provided at the time they made their contributions. In particular, specify the full names, addresses, and occupation information that were provided by the Shehans. Provide copies of documentation to verify this information. Also, if possible, identify the individual who processed the Shehan contributions.
 - b. Was any identification information missing from the Shehan contributions? If so, what, if anything, did the Committee do to ascertain the missing information? Please provide sufficient details concerning the steps taken by the Committee, identify all individuals involved in the process, and submit all documentation relating to the process.



2. Describe the nature of any and all communications the Committee had with Bill Shehan, Jr. concerning his daughters' contributions.

identify all of the individuals involved in the process.

- a. Describe what the Committee said to Mr. Shehan and how Mr. Shehan responded. Provide details and any documentation, including but not limited to correspondence, that relate to these communications.
- b. Identify the individual(s) who communicated with Mr. Shehan regarding Georgia and Susan Shehan's contributions.
- c. Did the Committee speak or correspond with anyone else besides Bill Shehan, Jr. concerning the Shehan contributions? If so, provide details including the name, address and phone number of that individual and describe the contents of the communication.
- 3. How did the Committee first become aware that Georgia and Susan Shehan were minor children? What did the Committee do upon learning this information? Please be specific. Provide details, including but not limited to a discussion of the steps the Committee took to ascertain the girls' ages, the identity of those individuals the Committee spoke with to verify the ages, and a description of the content of those conversations. Did the Committee contact Bill Shehan, Jr.? If so, describe the contents of that conversation.

Feel free to provide any additional information or documentation your client would like the Commission to consider in investigating this matter. If you have any questions regarding this request, do not hesitate to contact me at (202) 694-1650.

Sincerely.

na J. Peña-Wallace

Attorney